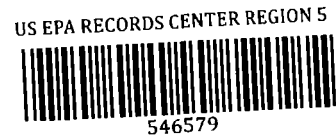




John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director



July 12, 2017

Ms. Shari Kolak
Remedial Project Manager
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Troy Well Field Unknown Source
Remediation Response
Correspondence
Remedial Response
Miami County
555001353004

Subject: Ohio EPA Review of Response to Comment on Draft Focused Feasibility Study Report for east Troy Contaminated Aquifer Site, Troy, Miami County, Ohio

Dear Ms. Kolak:

On June 8, 2017, the Ohio Environmental Protection Agency (Ohio EPA) Division of Environmental Response and Revitalization received the Response to Comments on Draft Focused Feasibility Study (FFS) Report for East Troy Contaminated Aquifer (ETCA) site located in Troy, Miami County, Ohio. The FFS was submitted by SulTRAC. Ohio EPA is providing the following comments to assist in the completion of an approvable document:

1. Additional Issue 1: Ohio EPA requests that sample location EPA-5 be preemptively mitigated or resampled. This location, which was sampled during the 2006-2007 removal action, is adjacent to soil Exposure Area 6 (EA-6). Perchloroethene (PCE) was detected in sub-slab samples above Ohio EPA's current residential chronic response action level of 210 ppbv, and trichloroethylene (TCE) was detected in sub-slab samples above Ohio EPA's current residential accelerated response action level of 13 ppbv. This indicates a potential future vapor intrusion issue. This location was resampled during Phase II remedial investigation (RI) activities (i.e., Phase II location 44). While PCE and TCE sub-slab concentrations were below Ohio EPA residential response action levels during Phase II RI activities, it is not clear if this is a result of variability or a change in subsurface concentrations between the 2006-2007 removal action and the Phase II sampling conducted in April 2013. There is uncertainty regarding how conditions may change if soil contamination in EA-6 is left in place rather than removed.
2. Comment 7: The response to comment 7 discusses that yard/irrigation wells exist within/just outside of the residential plume boundaries but that they are unused. If the wells are truly unused, Ohio EPA recommends that these wells be properly abandoned and sealed. This would comply with Ohio Administrative Code 3745-

Ms. Shari Kolak

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- 9-10 as well as eliminate the question of whether the unused wells could present a potential exposure pathway.
3. Comment 24: The response states the buildings on the north side of East Main Street (between Walnut Street and Mulberry Street) will be included in the preemptive mitigation area. While Ohio EPA prefers that these buildings be preemptively mitigated as requested, the response appears to differ from discussion during the April 3, 2017 conference call. Ohio EPA and U.S. EPA discussed sampling the buildings on the north side of East Main Street (between Walnut Street and Mulberry Street) rather than including them in the preemptive mitigation area during the call on April 3, 2017. Please provide additional clarification regarding how the preemptive mitigation area will be expanded and whether the buildings on the north side of East Main Street (between Walnut Street and Mulberry Street) will be included.
 4. Comment 24: Ohio EPA requests that sample locations EPA-30 and EPA-35 (along East Main Street) be included in the expanded preemptive mitigation area or resampled. These locations were sampled during the 2006-2007 removal action, and PCE was detected sub-slab above Ohio EPA's current residential chronic response action level of 210 ppbv. While PCE concentrations in indoor air were below the current Ohio EPA residential response action level for indoor air, the high sub-slab concentrations indicate a potential future vapor intrusion issue. There is also uncertainty regarding potential variability at these locations since they were not resampled during Phase I or Phase II remedial investigation (RI) activities. Ohio EPA is concerned that there is insufficient data to determine an interim action (i.e., mitigation) is not necessary at these locations.

If you have any questions or would like to meet to discuss the concerns, please contact me at (937) 285-6456 or Madelyn.Adams@epa.ohio.gov.

Sincerely,



Madelyn Adams

Site Coordinator

Division of Environmental Response and Revitalization

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MA/bp